

**FLASTER/GREENBERG P.C.**

By: Jeffrey A. Cohen, Esquire

Commerce Center

1810 Chapel Avenue West

Cherry Hill, NJ 08002

Phone: (856) 661-1900

Fax: (856) 661-1919

*Attorneys for Plaintiff, ODL, Incorporated*

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY (CAMDEN)**

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ODL, INCORPORATED,

Plaintiff,

v.

RSL, INC.,

Defendant.

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CIVIL ACTION

NO.

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff complains against Defendant for patent infringement as follows:

1. This is an action for patent infringement under the laws of the United States. The Court has jurisdiction pursuant to 28 U.S.C. §1331 and 1338(a). Venue is proper under 28 U.S.C. §1391 and 1400.

2. Plaintiff is a Michigan corporation based in Zeeland, Michigan.

3. Defendant is a New Jersey corporation, with its principal place of business located at 3092 English Creek Avenue, Egg Harbor Township, New Jersey 08234.

4. Defendant has committed acts of infringement in this judicial district.

5. United States Patent No. 6,601,633 (the "Patent"), entitled "Insulated Glass Blind Assembly," was duly issued on August 5, 2003.

6. Plaintiff, by assignment, is the sole and exclusive owner of all rights, title and interest to the Patent. A copy of the Patent is attached as Exhibit A.

7. Defendant has been and is manufacturing, using, offering for sale, or selling products that infringe the patent, as a direct result of which Plaintiff has sustained damages.

WHEREFORE, Plaintiff requests that the Court enter judgment against defendant as follows:

- a. Enjoining Defendant from infringing the patent;
  - b. Awarding Plaintiff damages and enhanced damages under 35 U.S.C. §284;
  - c. Awarding Plaintiff interest, costs and attorney fees under 35 U.S.C. §285;
- and
- d. Awarding Plaintiff all additional relief to which it is entitled.

**JURY DEMAND**

Plaintiff demands a trial by jury.

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Dated: January 10, 2005

By: /s/ Jeffrey A. Cohen (JC7673)  
Jeffrey A. Cohen, Esquire  
Commerce Center  
1810 Chapel Avenue West  
Cherry Hill, NJ 08002  
(856) 661-1900  
(856) 661-1919 (fax)  
[jeff.cohen@flastergreenberg.com](mailto:jeff.cohen@flastergreenberg.com)  
*Attorneys for Plaintiff,*  
*ODL, Incorporated*

Additional Counsel to Plaintiff (Not Admitted in NJ)  
James Moskal, Esquire  
**Warner Norcross & Judd LLP**  
900 Fifth Third Center  
111 Lyon Street, N.W.  
Grand Rapids, Michigan 49503  
(616) 752-2000

